



California Regional Water Quality Control Board

San Diego Region

Winston H. Hickox
Secretary for
Environmental
Protection

Internet Address: <http://www.swrcb.ca.gov/rwqcb9/>
9174 Sky Park Court, Suite 100, San Diego, California 92123
Phone (858) 467-2952 • FAX (858) 571-6972



TO: John Robertus
Executive Officer
SAN DIEGO REGIONAL WATER QUALITY CONTROL BOARD

In response refer to:

IC: 03-0283.02: richp

FROM: Paul J. Richter
WRCE
SAN DIEGO REGIONAL WATER QUALITY CONTROL BOARD

DATE: August 7, 2003

SUBJECT: U.S. NAVY GRAVING DOCK
RESPONSE TO COMMENTS REGARDING TENTATIVE ORDER NO.
R9-2003-0265
ITEM NO. 15

The Regional Board received one comment letter from the U.S. Navy dated July 28, 2003. The identification of the comments in this memorandum attempted to follow the format in the comment letter. Copies or paraphrases of the concerns listed in the letter and staff's responses are provided below. The original letter should be reviewed to be sure the reader understands the comments and to ensure that the copied or summarized comments are accurate.

Letter from the U.S. Navy dated July 28, 2003

General Comment

Comment 1: Emergency Fire Suppression (EFS) Water will no longer be discharged to San Diego Bay. A new discharge associated with the Graving Dock's "Saltwater Supply System (SSS)" will become the operation description for Outfall 004. The Saltwater Supply System is in the final stages of installation and will soon be turned over to the Navy by the contracting firm who installed it. Upon taking possession of the Saltwater Supply System, the Navy will test the discharge water as required under the requirements of Form II C, and forward the analytical results to the SD RWQCB. Sampling for California Toxics Rule Priority Pollutants and the Implementation Policy will also be done at that time. Sampling is currently scheduled for July 31, 2003 at 09:00. A revised facility map and amended USEPA Form 2C is submitted with these comments as enclosure (2) to this cover.

California Environmental Protection Agency

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Web-site at <http://www.swrcb.ca.gov>.

Response 1: An errata sheet will be developed to include the elimination of the discharge of Emergency Fire Suppression (EFS) Water and the inclusion of Saltwater Supply System (SSS). The errata sheet will also include provisions to accept monitoring conducted prior to the adoption of the tentative Order provided the monitoring is equivalent to the monitoring requirements in the tentative Order.

Tentative Order

Comment 2: Page 2. Section 3.; Recommend adding the words, “directly or indirectly” to the sentence, “The USN Graving Dock currently diverts these discharges directly or indirectly to the San Diego Metropolitan Sanitary Sewer System (SDMSSS).

Response 2: A change to Finding 3 will be made as noted.

Comment 3: Page 2. Section 4.a.; Recommend changing “Emergency fire suppression water” to “Saltwater Supply System”.

Response 3: Changes to the tentative Order, Monitoring Reporting Program and Fact Sheet will be made to replace references to *Emergency Fire Suppression Water* to *Saltwater Supply System*.

Comment 4: Page 2. Section 5. Recommend inserting the following statement from the existing permit:

This order does not apply to discharges from vessels which occur at the graving dock facility which are independent of Ship Repair Operations (i.e. cooling water) However, the Navy may be responsible for the consequences (e.g. cleanup) of discharges within and from the graving dock, including those discharges which are not subject to National Pollution Discharge Elimination System (NPDES) requirements, pursuant to 40 CFR 122.3.

Response 4: A change to Finding 5 will be made as noted..

Comment 5

and 6: Page 7. Section B.1.a. Recommend changing “Emergency fire suppression water” to “Saltwater Supply System.”

Page 8. Section B.2. Recommend changing EFS to Saltwater Supply System (SSS).

Response 5

and 6: Changes to the tentative Order, Monitoring Reporting Program and Fact Sheet will be made to replace *Emergency Fire Suppression Water* with *Saltwater Supply System Water*.

Comment 7

and 8: Page 8. Section B.2. Recommend adding language under Acute Toxicity stating that, "*The Acute Toxicity standard may be reconsidered based upon the outcome of the Navy's ongoing Alternative Toxicity Monitoring study.*"

Page 9. Section B.3: Recommend adding language under Acute Toxicity stating that, "*The Acute Toxicity standard may be reconsidered based upon the outcome of the Navy's ongoing Alternative Toxicity Monitoring study.*"

Response 7

and 8: A change to the *Acute Toxicity* specification is not recommended. If the Navy's *Alternative Toxicity Monitoring study* provides sufficient information to modify the tentative Order, the Navy can ask for the modification at that time.

Comment 9: Page 12. Section E.9: Please clarify if this requirement means that if the QA/QC sample fails and the results are declared invalid the discharge shall be subject to an enforcement action. As an example, during an Acute Toxicity test the QA/QC sample fails due to a bad batch of marine organisms, rendering the test invalid, the SD RWQCB would issue an enforcement action for this failure.

Response 9: Upon review of 40 CFR 122.41 and the Porter-Cologne Water Quality Control Act (Water Code), Provision E.9 shall be deleted. The Provision was not found in 40 CFR 122.41 or the Water Code.

Comment 10: Page 13, Section F.5. ; "...a written follow-up report within ten days..." Please clarify "calendar" or "working" days.

Response 10: Upon review of 40 CFR 122.41(l)(6), Provision E.10 will be changed from ten days to five days (calendar days).

Comment 11: Attachment A, Facility Map. Please note that the facility map (attached with these comments) has been updated to identify the discharge location of the Saltwater

Supply System Outfall 004. Also, a correction to the discharge locations of dewatering Outfalls 001 and 002 has been made. Both outfalls are located on the north side of the Graving Dock's ship entrance.

Response 11: The tentative Order and Fact Sheet will be modified to include the revised map.

Comment 12: Attachment B, Page B-1, Section 2. The San Diego Unified Port District is listed as an authorized inspector for the Graving Dock Facility. The San Diego Unified Port District has no jurisdiction over the Graving Dock. Therefore, this requirement should be removed from the new permit.

Response 12: Appendix B shall be modified as noted.

Comment 13: Attachment B, Page B-2, Section 3.b. Please note typo on the word BMsP.

Response 13: The typographic error will be corrected.

Comment 14: Attachment B, Page B-4, Section 6.a.(4). In reference to the first sentence; the phrase "... in storm water discharges or non storm water discharges upon adoption of this order." The purpose in this requirement is difficult to understand. Please provide the rationale for inserting this phrase and changing it from the existing Graving Dock permit language. Recommend keeping August 12, 1998 permit language. Also, please note typo on the word "adoption".

Response 14: The phrase is meant to clarify that all spills that are released through either *storm water discharges* or other *point source discharges* be reported. The typographic error will be corrected.

Comment 15: Attachment B, Page B-4, Section 6.a.(6). Please note that the Graving Dock has no pervious areas and as such, the Soil Erosion BMP requirement is not applicable. Recommend removing from the permit language.

Response 15: A change to the BMPs requirements is not recommended. An explanation that the particular BMPs does not apply to the Navy Graving Dock facility is an adequate response in the BMPs. Attachment B is a general description of BMPs Program similar to that listed in the general industrial storm water permit.

Comment 16: Attachment B, Page B-7, Section 8.c.(16). Please note that the Graving Dock does not have a Floating drydock, shipbuilding ways, or marine railway. Recommend removing these items from the permit.

Response 16: A change to the BMPs requirement, Section 8.c.(16) will be made as noted.

Comment 17: Attachment B, Page B-8.c.(22). Please note that the Graving Dock does not have ship launch grease/wax. Recommend removing this item from the permit.

Response 17: A change to the BMPs requirement, Page B-8.c.(22) will be made as noted.

Comment 18: Attachment B, Page B-9, Section 8.d.(1)(h) Please note that the Graving Dock has no pervious areas and as such, the Soil Erosion BMP requirement is not needed. Recommend removing this item from the permit.

Response 18: A change to the BMPs requirements is not recommended. An explanation that the particular BMPs does not apply to the Navy Graving Dock facility is an adequate response in the BMPs. Attachment B is a general description of BMPs Program similar to that listed in the general industrial storm water permit.

Comment 19: Attachment B, Page B-10, Section 9.d. (last sentence), recommend the words “storm water” be inserted into the sentence, “The evaluation report shall be submitted as part of the annual **storm water** report (see Monitoring and Reporting Program), retained...”

Response 19: A change to Attachment B, Section 9.d. (last sentence) will be made to include and clarify that the *annual storm water report period* is the reporting period.

Comment 20: Attachment E, Page E-1, “Existing ship modification, repair, and maintenance site (existing site)” This is a new definition added to this permit compared to the existing August 12, 1998 permit. What is the source of this definition and what was the rationale for adding it to the permit?

Response 20: The definition is from the recently adopted shipyard permits. It is not necessary for the tentative Order for the USN Graving Dock and will be deleted.

Comment 21: Attachment E, Page E-1, “First flush of storm water runoff” This is a new definition of this term compared to the existing August 12, 1998 permit. What

was the source of this definition and what was the rationale for changing it from the first ¼ inch of precipitation to the current version of the first 1-inch of precipitation?

Response 21: A change will be made to the definition by replacing the 1-inch reference with 0.25-inch. Except for the reference to 1-inch of runoff rather than 0.25-inch of runoff the definition is the same as the current Order. The seven day reference is similar to the recently adopted Orders for the Naval Base facilities in San Diego.

Comment 22: Attachment E, Page E-2, “High risk areas” The definition of this term has changed compared to language in the existing August 12, 1998 permit. Please provide the source of this definition and the rationale(s) for changing this definition from the existing permit language. (Please see below.) The words in bold print identify the differences in the two definitions.

Draft Permit definition:

*“High risk areas are areas where wastes or pollutants **from ship modification, repair, and maintenance activities** (including abrasive blast grit material, primer, paint, paint chips, solvents, oils, fuels, sludges, detergents, cleansers, hazardous substances, toxic pollutants, non-conventional pollutants, materials of petroleum origin, or other substances of water quality significance) are **subject to** exposure to precipitation, run-on, and/or runoff.”*

Existing Permit definition:

*“High risk areas are areas where **significant quantities of** wastes or pollutants (including abrasive blast grit material, primer, paint, paint chips, solvents, oils, fuels, sludges, detergents, cleansers, hazardous substances, toxic pollutants, non-conventional pollutants, materials of petroleum origin, or other substances of water quality significance) are **exposed** to precipitation, run-on, and/or runoff **and there is a pathway by which the exposed wastes or pollutants could be discharged.**”*

If no source or rationale can be determined, recommend the following definition be used to better reflect existing permit conditions:

*“High risk areas are areas where **significant quantities of** wastes or pollutants **from ship modification, repair, and maintenance activities** (including abrasive blast grit material, primer, paint, paint chips, solvents, oils, fuels, sludges, detergents, cleansers, hazardous substances, toxic pollutants, non-conventional pollutants, materials of petroleum origin, or other substances of water quality significance) are **subject to** exposure to precipitation, run-on, and/or runoff **and there is a pathway by which the exposed wastes or pollutants could be discharged.**”*

Response 22: The definition is from the recently adopted shipyard permits. The recommended definition is acceptable and will be added to the tentative Order for the USN Graving Dock.

Comment 23: Attachment E. page E-2, "Natural Light" The August 12, 1998 permit definition of Natural Light has "as specified by the SDRWQCB." in it. The draft permit changes this language to "as specified by the Executive Officer." Please provide the rationale for the change in definition.

Response 23: Upon advice from counsel, the language will be changed to *Regional Board*. The change to *Executive Officer* from *SDRWQCB* was from a previous permit.

Comment 24: Attachment E., page E-3 "New ship construction, modification, repair, and maintenance site (new site)". This is a new definition added to the permit. Please provide the source of this definition and what was the rationale for adding it to the permit.

Response 24: The definition is from the recently adopted shipyard permits. It is not necessary for the tentative Order for the USN Graving Dock and will be deleted.

Comment 25: Attachment E. Page E-3, "Ship construction, modification, repair, and maintenance facilities". This is a new definition added to the permit. Please provide the source of this definition and what was the rationale for adding it to the permit.

Response 25: The definition is from the recently adopted shipyard permits. It is not necessary for the tentative Order for the USN Graving Dock and will be deleted.

Monitoring and Reporting Program

Comment 26: Page M-2, Section B.3. and Section B.11. where it requires that: "*Duplicate copies of the monitoring reports (or results) ...must be submitted to the USEPA....*"

Due to the large volume of paperwork generated for monitoring reports, including other consumable resources that are required to duplicate these reports (i.e. binders, dividers, VHS tapes, etc.), it is requested that report submittals to the

USEPA be limited to the Annual Report Summary. The Annual Report Summary provides detailed information concerning the Annual Stormwater Report, The Annual Sediment Monitoring Report, and the Annual Effluent Monitoring Report.

Response 26: The requirement to submit copies of all monitoring reports to the USEPA is mandatory pursuant to the *Memorandum of Agreement* (p. 36) between the USEPA and the State Board for the implementation of the NPDES program.

Comment 27: Page M-3, Section C.1. (2 locations) and Table 1. recommend changing “Emergency Fire Suppression” to “Saltwater Supply System”.

Response 27: A change to Page M-3, Table 1, will be made as noted.

Comment 28: Page M-5, Section C.2. (Last paragraph), Recommend changing “quarterly effluent monitoring report” to “Graving Dock Flooding Log” to better define the type of effluent monitoring being reported.

Response 28: The recommended change will be made.

Comment 29: Page M-6, Section D.3.a.ii. There is a concern with the language: “...(even if the sample is not taken during the first hour of the discharge)” that has been added to this requirement. We believe this additional language was added to the permit in order to avoid a wet season where no sampling may occur. While we understand the rationale for adding this language, CNRSW does not agree that it is correct. Adding this language could skew sample results for data comparison with one set of data representing first flush storm water discharge and a second set of data representing an 11th hour of a storm water discharge.

For this reason, CNRSW believes the definition should not be altered. The decision to sample or not to sample a rain event that occurs outside of the currently defined time frame should be left to the discharger and should be based upon the specifics of each particular rain event. This will help to normalize the data for comparison.

Response 29: The recommended change will be made. To be consistent with the recently adopted Order for NASSCO, Order No. R9-2003-0005, page M-9, Storm Water Monitoring D.5.2.ii, *Outside of scheduled facility operating hours* and all of section D.5.d will be deleted also. (See *comment 34* and *response to comment 34*.)

Comment 30: Page M-7, Section D.3. Table 2, Chronic Toxicity is listed as a monitoring requirement for Industrial Storm Water Discharges at the Graving Dock. Chronic Toxicity is not listed as a monitoring requirement in the Continental Maritime, Southwest Marine, or NASSCO NPDES Permits. Please provide the rationale for making this a requirement for the Graving Dock when this parameter is not required in other neighboring shipyard permits. CNRSW requests that these monitoring requirements be uniformly applied to these permit holders. Please see attached Addendum No. 1 to Order 98-53 NPDES Permit No. CA0107867, dated November 18, 1998 with a Chronic Toxicity testing discussion from the SWRCB.

Response 30: The requirement for chronic toxicity will be deleted for the Industrial storm water monitoring.

Comment 31: Page M-8, Table 2, footnotes, If Chronic Toxicity is removed from this permit, Footnote 4 will no longer be needed.

Response 31: The footnote is not in the tentative Monitoring and Reporting Program.

Comment 32: Page M-8, Section D.4.a. This is a new definition of this term compared to the existing August 12, 1998 permit. Recommend adding the following items (in **bold**) to match the current permit language.

*“The discharger shall visually observe and collect samples of storm water discharges from all drainage areas **where industrial activities occur or have occurred during the previous year.** The storm water discharge collected and observed shall be representative of the storm water discharge in each drainage area.”*

Response 32: The change will be made to the tentative Order as recommended.

Comment 33: Page M-9, Section D.5.a.iii. Recommend changing the word “proceeding” to “preceding”.

Response 33: The typographic error will be changed.

Comment 34: Page M-9, Section D.5.d. This is a new requirement. While we understand the rationale for adding this language, CNRSW does not agree that it is correct. Adding this language could skew sample results for data comparison with one set

of data representing first flush storm water discharge and a second set of data representing an 11th hour of a storm water discharge.

For this reason, CNRSW believes the definition should not be altered. The decision to sample or not to sample a rain event that occurs outside of the currently defined time frame should be left to the discharger and should be based upon the specifics of each particular rain event. This will help to normalize the data for comparison.

Response 34: The recommended change will be made.

Comment 35: Page M-11, Section D.8.d. For clarification, recommend the words “Attachment B, Section 9.d. of” be inserted into the sentence, “...required by **Attachment B, Section 9.d of** Order No...R9-2003-0265;”

Response 35: A change to the citation will be made to add *Attachment B, Section 9.d of* will be made.

Comment 36: Page M-11, Section E.1. Flood Water is not listed in the sub-paragraphs. SDRWQCB letter dated March 7, 2003 and SDRWQCB letter dated June 2, 2003 requires effluent analysis for priority pollutants to be submitted for Flood Water (Outfalls 001 and 002). Sample collection is scheduled for August 4, 2003 at 08:00.

Response 36: The recommended change to add *Flood Water* will be made.

Comment 37: Page M-11, Section E.1.a. Recommend changing “Emergency Fire Suppression” to “Saltwater Supply System”.

Response 37: The recommended change from *Emergency Fire Suppression Water* to *Saltwater Supply System Water* will be made.

Comment 38: Page M-12, Section F. Table 3, Annual reporting requirement due date has been changed from March 1 to August 30. Recommend keeping the Report Period the same as the existing permit and changing the Due Date for annual reports from March 1 to September 1.

Response 38: The recommended changes for the monitoring report period and report due date will be changed to July-June and September 1 respectively.

Comment 39: Page M-12, Section F. Table 3, Recommend Appendix A Priority Pollutants and 2,3,7,8-TCDD and congeners Report Period “start date” be changed to accommodate two sampling events scheduled for July 31, 2003 and August 1, 2003. If not changed, these sampling requirements will need to be postponed until the next flooding event scheduled some time in October 2003.

Response 39: The recommended change to delete the start date of August 13, 2003 will be made. The revised report period will be *prior to June 30, 2004*, therefore any monitoring done in compliance with the tentative Order prior to adoption may satisfy the requirement.

Comment 40: Page M-12, Section F. Table 3. For clarity and easy reference, recommend listing the “Report Types” in column 1 of Table 3. as follows:

Table 3. Monitoring and Reporting Schedule. (Recommended changes are in ***Bold Italics***)

Report <i>Type</i> /Frequency	Report Period	Report Due
Monthly <i>Compliance Certification</i>	Each month	By the first day of the second month after the month of sampling
Quarterly <i>Spill and Illicit Discharge Log</i> <i>Graving Dock Flooding Log</i> <i>Graving Dock Floodwater Monitoring Report (Video Tape)</i>	January through March	May 1
	April through June	August 1
	July through September	November 1
	October through December	February 1
Semi-Annually Waste Hauling Log	January through June July through December	August 1 February 1
Annually <i>Annual Report Summary</i> <i>Effluent Monitoring Report</i> <i>Storm Water Monitoring Reports with Annual Comprehensive Site Compliance Evaluation Report and Certification (Attachment B requirement)</i> <i>Chemical Utilization Audit</i> <i>Sediment Monitoring Report</i>	<i>July 1 through June 30</i>	<i>September 1</i>
Annual storm water monitoring	July 1 through June 30	August 1

Report <i>Type</i> /Frequency	Report Period	Report Due
Instances of noncompliance	per <i>Monitoring Provision B.9</i> , page M-2	As specified in <i>Monitoring Provision B.9</i> , page M-2
Appendix A Priority Pollutants	July 30 , 2003 through June 30, 2004	August 1, 2004
2,3,7,8-TCDD and congeners	July 30 , 2003 through June 30, 2005	August 1, 2004, or August 1, 2005

Response 40: The recommended change will made to include report *type* and to clarify the report period as noted in response to *Comment 39*.

Comment 41: Page M-14, Section K.1.b. Recommend that the language remains the same as in the current MRP, Page M-23, Section G.a.iii for discarding the sediment samples.

Response 41: A change is not recommended. The process is not different from the previous Order. The discharger may ask for approval to discard the samples.

Comment 42: Page M-15, Section K.2. (Final sentence) Remove “and” from “*The final Sample Collection Plan and shall...*”

Response 42: The recommended change to remove *and* will be made.

Comment 43, 44, 45,

and 46: Page M-17, Table 5. Arsenic, Recommend replacing EPA Method “7060 or 7061” with EPA Method “6010 or 6020” because ICP/MS is the Best Available Technology.

Page M-17, Table 5. Lead, Recommend replacing EPA Method “7421” with EPA Method “6010 or 6020” because ICP/MS is the Best Available Technology.

Page M-17, Table 5. TPH, Recommend replacing EPA Method “8015 or DHS” with EPA Method “8270” because to accommodate reporting requirements identified in footnote 3.

Page M-17, Table 5. PCBs/PCTs, EPA Method “8080” is no longer used. For PCBs, recommend replacing EPA Method “8080” with EPA Method “8082”. For PCTs, recommend replacing EPA Method “8080” with analysis method GC-ECD.

Response 43, 44, 45,

and 46: The recommended change to the method citation will be made as noted.

Comment 47: Page M-18, Footnote 6. Recommend that Footnote 6 be removed.

Response 47: The footnote will be deleted.

Comment 48: Page M-18, Section L. Recommend that Section L. read, “*SEDIMENT MONITORING RESULTS AND REPORTS*”.

Response 48: The recommended change to Section L. will be made.

Comment 49: Page M-18, Section L.1. Recommend that Section L.1. read, “*SEDIMENT MONITORING REPORTS*”. Sediment monitoring results are not reported on Discharge Monitoring Report forms. Therefore, recommend the paragraph that follows read something like:

“Sediment monitoring results must be reported in a format that will facilitate an objective evaluation of sediment conditions. The sediment monitoring report shall be submitted...”

Response 49: The recommended changes will be made.

Comment 50: Page M-18, Section L.1. Recommend removing the word “Discharge” from the paragraph preceding L.1.a..

Response 50: The recommended change will be made.

Comment 51: Page M-20, Section M.1. Discusses Sediment Monitoring Suspension. A sediment monitoring program for Chollas Creek and Paleta Creek TMDL development is slated to start in 2004. The TMDL being developed in these areas is for sediment and will be conducted by the Navy in conjunction with SDRWQCB Staff. CNRSW requests that Graving Dock Sediment Monitoring requirements be suspended during Chollas Creek and Paleta Creek TMDL sediment sampling. Once Chollas Creek and Paleta Creek TMDL sediment sampling is complete, the SDRWQCB can determine if the Graving Dock sediment monitoring requirement should be resumed.

Response 51: A change to the Sediment Monitoring Suspension requirements is not recommended. The Graving Dock facility and the mouth of Chollas and the mouth of Paleta Creek are not the same location and are not contiguous. The Navy may apply for a modification of the monitoring program when the sediment TMDL for Chollas Creek and Paleta Creek are developed.

Comment 52: Page M-18, Section L.1. Recommend removing the word “Discharge” from the paragraph preceding L.1.a.

Response 52: The recommended change will be made.

Comment 53: Historical laboratory test data have shown where the following constituents have not been detected in the Caisson Gate Ballast Water from the time Order No. 98-53 has been issued to present.

Oil & Grease
Chromium
Silver

Settleable Solids
Lead
PAHs

Arsenic
Mercury

Cadmium
Nickel

Historical data have also shown where Tributyltin and Total Residual Chlorine were detected only once during this five year period; Tributyltin, at 0.011 µg/L, collected on May 22, 2000 and Total Residual Chlorine, at the laboratory reporting limit of 0.06 mg/L, collected on November 12, 1998.

There is no reason to suspect or believe that these constituents could be, or would have the potential to be introduced into the Caisson Gate Ballast effluent water. For this reason, it is requested that the above mentioned constituents be permanently removed from the monitoring requirements of Order No. R9-2003-0265.

Response 53: A change to the monitoring requirements is not recommended. The constituents are monitored annually. The monitoring reporting program allows the U.S. Navy to suspend monitoring of these constituent based upon the condition specified in Footnote 1 to Table 1. (page M-3).

Fact Sheet

Comment 54: Page 4, Section C, Replace Emergency Fire Suppression (EFS) Water narrative with the Saltwater Supply System (SSS) narrative (below). Edit Table of Contents and List of Tables accordingly. Note: Emergency Fire Suppression water discharges will be diverted to the sanitary sewer.

Response 54: References to EFS will be changed to SSS and EFS will be identified as being discharged to the sanitary sewer system.

Comment 55: C. Saltwater Supply System (Testing)

The Graving Dock's Saltwater Supply System has been restored to its near original design. It replaced an interim service, which supplied salt water from Pier 13 through a failing pipeline to the Graving Dock Facility. Water is now taken from the Graving Dock dewatering channel, located on the north side of the Graving Dock ship entrance, at 33 feet below Mean Low Level Water (MLLW). Salt water is delivered to ten service galleries located along the upper walls of the Graving Dock basin using three pumps; each rated at 350 GPM at 125 psi. All discharges from these pumps are diverted to the sanitary sewer system.

The Saltwater Supply System is also designed to serve as a fire protection system. This part of the system employs two fire pumps; each rated at 1,500 GPM at 150 psi. The manufacturer's product specification recommends that the two fire pumps and pressure relief valve be operationally tested for five minutes each week. Thus, 15,000 gallons per week of salt water will be discharged to San Diego Bay. All other discharges from these pumps are diverted to the sanitary sewer system.

Response 55: The Saltwater Supply System information will be added to the Fact Sheet.

Comment 56: Page 9, Section IV, CNRSW requests a copy to be provided of the NPDES Permit Rating Worksheet used to calculate USN Graving Dock point score.

Response 56: The NPDES rating work sheet will be mailed to the CNRSW.

Comment 57: Page 11, Section V.B, Please note that the introduction of the *Water Quality Control Policy for Enclosed Bays and Estuaries of California (Bays and Estuaries Policy)* states,

“This policy does not apply to wastes from vessels or land runoff except as specifically indicated for siltation (Chapter III4.) and combined sewer overflows (Chapter III7.).”

Response 57: Comment noted.

Comment 58: Page 15, Section VIII. REFERENCES, An inspection of the U.S. Navy Graving Dock was conducted on February 12, 2003 by SDRWQCB contracted inspectors. It is requested that this inspection report be added to this listing.

Response 58: It is not necessary to include the contractor’s inspection report in the references because the contractor’s inspection was not used as a reference for the tentative Order.